

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HELEN HANKS, on behalf of herself and all
others similarly situated,

Plaintiff,

VS.

VOYA RETIREMENT INSURANCE
AND ANNUITY COMPANY,
formerly known as Aetna Life
Insurance and Annuity Company,

Defendant.

Civil Action No. 16-cv-6399 (PKC)

**NOTICE OF CLASS COUNSEL’S MOTION FOR ATTORNEYS’ FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND INCENTIVE AWARD**

PLEASE TAKE NOTICE that Class Counsel for Plaintiff Helen Hanks, on behalf of herself and the certified class, will move this Court before the Honorable P. Kevin Castel for an order for attorneys' fees, reimbursement of litigation expenses, and an incentive award for Plaintiff Helen Hanks.

In support of the motion, Class Counsel will rely upon the accompanying memorandum of law, the declarations attached thereto, and other written or oral argument as may be requested or permitted by the Court.

Dated: April 4, 2022

/s/ Seth Ard

Seth Ard

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument has been served on the following counsel, this April 4, 2022.

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